



Charles W. McKee

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June 28, 2019

Via ECFS

Lisa M. Fowlkes
Bureau Chief
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Emergency Alerts, Amendments to Part 11 of the Commission's Rules Regarding the Emergency Alert System, PS Docket No. 15-91

Dear Ms. Fowlkes:

Thank you for your letter of June 5, 2019, regarding the Federal Communications Commission ("FCC" or "Commission") rules requiring participating Commercial Mobile Service ("CMS") Providers to deliver geo-targeted Wireless Emergency Alert ("WEA") messages to 100 percent of the target area specified by an alert originator, within one-tenth of a mile, by November 30, 2019.¹

Sprint Corporation ("Sprint") was the first U.S. carrier to launch WEA on its wireless network in 2011 and remains fully committed to the spirit and intent of WEA as an important tool in communicating vital information to wireless customers. We have developed and improved the capabilities of the technology by introducing new enhancements to WEA over the past decade and look forward to working with the Commission to improve this important, life-saving service.

Sprint is cautiously optimistic that, as long as current plans and projections progress favorably, we will meet the FCC deadline of November 30, 2019. However, as Sprint and the wireless industry has noted in our previous filings, CMS providers are but one piece of the overall wireless ecosystem necessary to adopt, implement and bring to market the geo-targeting alert capability. We have limited control over the inputs necessary for this service. Sprint is committed, however, to bring forward these latest improvements to WEA.

¹ Letter from Lisa M. Fowlkes, Bureau Chief, Public Safety and Homeland Security Bureau, Federal Communications Commission, to Charles W. McKee, Vice President, Government Affairs, Federal and State Regulatory, Sprint Corporation (dated Jun. 5, 2019).

Sprint has worked with the standards bodies to develop the necessary WEA technical standards. Sprint's network teams are deploying, on an aggressive schedule, the software necessary to support the geo-targeting enhancements to WEA. At the cell site level, hardware throughout the network is currently on schedule to be updated with the software required to meet the deadline. We are working with device manufacturers and have been given assurances they are on track to test in a laboratory environment the newest pre-production devices designed to include the enhancements for WEA geo-targeting within the next month or two.

If the device timeline remains intact, it should align with the deployment of the network elements required to support the enhancements. Commercial launch and availability of at least one new wireless device compatible with Sprint's network and supporting WEA geo-targeting is expected to occur in time for the deadline. Similarly, analyses are underway to determine which devices, if any, may be technologically capable of an over-the-air software update to accommodate the new enhancements.

The testing and implementation delays of the May 1, 2019, WEA enhancements, due in part to the federal government shutdown earlier in the year, could potentially impact testing of WEA geo-targeting features. In the laboratory and production settings, Sprint has more than a dozen different software platforms to test across all of the devices that may eventually support the enhancements. As of now, despite best efforts and intentions on both sides, connectivity is still not in place between Sprint's laboratory and the federal government to conduct end-to-end testing for the May WEA enhancements.

Sprint expects to begin testing in the laboratory this summer, assuming connectivity can be established in the near term. If there are further delays, it is possible that testing of the current WEA requirements may interfere with the timelines planned for testing the geo-targeting enhancements later in the summer. While it is possible that testing for all new WEA features can be combined, these delays may impact production launch of the geo-targeting enhancements.

As a long-time leader in the provision of WEA, Sprint remains committed to it and the public safety benefits it brings. Thank you for your attention to this important issue.

Please contact me if you have any further questions or concerns.

Sincerely,

/s/ Charles W. McKee

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